

ORIGINAL

FILED
HARRISBURG, PA

MAY 27 2004

MARY E. D'ANDREA, CLERK
Per RJM
Deputy ClerkIN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff,

v.

YORK COUNTY POLICE DEPARTMENT,
JAMES H. MORGAN, RICHARD PEDDICORD,
RAYMOND E. CRUAL, GENE FELS,
DET. KESSLER, CO. BAYLARK,
RANDY BIPES, BRIAN WESTMORELAND,
and DETECTIVE GLOWCZESKI
Defendants,CIVIL ACTION NO. 1:01-CV-1015
(Judge Kane)
(Magistrate Judge Mannion)

JURY TRIAL DEMANDED

MOTION FOR PROTECTIVE ORDER

Plaintiff's, Tyrone P. James, hereby moves this Honorable Court for a Protective Orders; pursuant to Federal Rule Of Civil Procedure, Rule 26 (c)(2)(4)(5)(6) and (8).

1. On May 17, 2004, Defendants, mailed Notice of Deposition, upon Plaintiff's, scheduling hearing for May 25, 2004, at the State Correctional Institution, Rockview, at 10:30 A.M.; Plaintiff's received said notice on May 20, 2004, by way of institution mail.

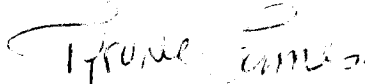
2. The Defendants by way of counsel, have failed to give reasonable notice of said hearing to Plaintiff's; or give this Plaintiff's sufficient amount of time to make stipulation or come to some form of agreement as it relate to the taking of Deposition.

3. Plaintiff's, sought leave from this Honorable Court, to issued an Protective Order Protecting Plaintiff's , from annoyance, embarrassment, oppression, or undue burden, or expense, until both the defendants and plaintiff's comes to some form of agreement, under stipulation, in conducting Discovery. Plaintiff's also would stipulated that the deposition hearing be conducted with no one present except persons designated by the Court, and that Deposition afterward, be sealed, to be opened only by order of the Court.

4. Plaintiff's had made reasonable good faith effort to resolved this Discovery dispute, without any interference from the Court.

WHEREFORE, Plaintiff's pray that this Honorable Court grant him a Protective Order, until both this Defendant and Plaintiff's have reasonable time to make stipulation and come to some form of agreement in conducting deposition against this plaintiff.

Respectfully Submitted,



Tyrone P. James, EX 9451.

EX 9451

P.O. Box A

Bellefonte, PA 16823-0820.

Date: May 24, 2004,

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION NO. 1:01-CV-1015
	:	(Judge Kane)
	:	(Magistrate Judge Mannion)
YORK COUNTY POLICE DEPARTMENT,	:	
JAMES H. MORGAN, RICHARD PEDDICORD,	:	JURY TRIAL DEMANDED
RAYMOND E. CRUAL, GENE FIELDS,	:	
DET. KESSLER, CO. BAYLARK,	:	
RANDY SIPES, BRIAN WESTMORELAND,	:	
and DETECTIVE GLOWCZESKI	:	
Defendants,	:	

CERTIFICATE OF SERVICE

I, Tyrone P. James, Plaintiff's, oro se, hereby certified that, I am this day serving a true and correct copy to assigned counsel's, "Motion For Protective Order," in the manner set forth below to the following, by placing said legal manila envelope, deposited into the institutional mail box, and turning over said documents to prison officials for mailing:

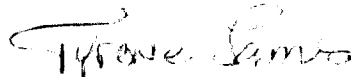
BY FIRST CLASS U.S. MAIL:

Jason C. Guirintano
Attorney General Office
Commonwealth Of Pennsylvania
15th Floor, Strawberry Square
Harrisburg, PA 17120

Donald L. Reihart, Esq.,
Law Office Of Donald L. Reihart
3015 Eastern Blvd., Suite 204
York, PA 17402

I, Tyrone P. James, verified thet the foregoing is true and correct, pursuant to 28 U.S.C. § 1745.

Date: May 24, 2004.

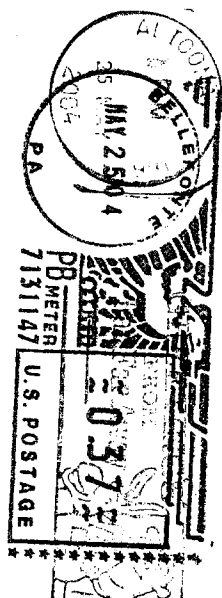


Tyrone P. James
Ex 9451
P.O. Box A
Bellefonte, PA 16823-0820.

Name: *Yvonne James*
Number: *EX9451*
Box *A*
Belleville, Pa. 16823

Legal Mail

INMATE NO.
PA DEPT OF
CORRECTIONS



Office of the Clerk

United States District Court

Middle District of Pennsylvania

228 Walnut Street

PO Box 983

Harrisburg, PA 17108

17108+0333
17108+0333